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Subject: Norris Lab Update

Doug and Deb – I wanted you to be aware of a sensitive response action we will undertaking next week in MT. Let us know if you have any questions, or want additional information. Marty McComb is the Region's lead OSC for this action.

Background

Norris Lab is located in a residential area at the center of town in Norris, Montana (Madison County). It is along the banks of Hot Springs Creek just upstream of its confluence with the Madison River. The facility performed assay tests and other chemical analyses for the mining industry until recently when it was closed after an inspection by the Occupational Safety and Health Administration (OSHA).

There are hundreds of improperly stored and abandoned containers of hazardous substances at the facility. Many of these containers contain highly volatile compounds and several are exposed to the elements. The soil around the facility is contaminated with byproducts from the laboratory and a storm drain from the facility leads directly to the creek.

The Norris Volunteer Fire Department has placed a "Do Not Respond" order on the property of the Site and the Madison County Office of Emergency Management is concerned about the state of the facility located on the property. The Montana Department of Environmental Quality (MtDEQ) worked with the property owner to explore clean-up options but the owner is financially unable to fund the effort. MtDEQ subsequently requested USEPA's urgent assistance to clean-up the Site.

Assessment

USEPA deployed a Response Team to the site on June 21, 2018 to conduct an assessment. USEPA's Response Team met on-site with the property owner, the property owner's consultant and officials from both Montana's Department of Environmental Quality, Madison County Office of Emergency Management and Norris Volunteer Fire Department to coordinate response activities. USEPA cleared debris at the facility to establish access to the facility and create safe working zones. USEPA then inventoried and characterized containers of hazardous substances to facilitate their eventual disposal.

During this assessment, USEPA discovered dozens of containers of perchloric acid and several containers of picric acid that had been exposed to the elements. These containers are decades old and are showing signs of explosive instability. The OSC, in coordination with state and local stakeholders, determined that a controlled explosion is the best way to address these unstable containers and contacted explosives experts with the US Air Force for assistance.

Response

USEPA mobilized a Response Team to the site on July 9, 2018 to remove and dispose of the following categories of hazardous substances:

- 1. Hi-hazard items that are highly volatile and/or exposed to the elements. These items will require on-site incineration using controlled explosives.
- 2. Laboratory hazardous waste that has accumulated on-site and is exposed to the elements.
- 3. Improperly stored and abandoned containers of hazardous substances found in the laboratory.

- 4. Electronic waste and circuitry that has accumulated on-site and is exposed to the elements.
- 5. Soil around the facility that is contaminated with byproducts from the laboratory.
- 6. Un-analyzed portions of soil samples found at the facility.

Current Activities

The Response Team has cleared a nearby workshop to support operations. All chemicals except the highly volatile perchloric and picric acids have been temporarily packaged and moved from the lab to the workshop. The Team has now begun the process of bulking these chemicals for transport and disposal.

An explosives team from the Air Force visited the site, agreed with the concerns on the OSC and developed a plan to address the threat posed by the highly volatile compounds. The plan involves extracting the chemicals from the facility, transporting those containers in a blast proof trailer to an open field 2-miles outside of town and incinerating them using controlled explosives. In preparation for these activities, USEPA has begun, clearing safe pathways in the facility to the chemicals, construction of a protective berm around the facility in case of an inadvertent explosion and has begun excavation of 2 large holes at the detonation site to support the Air Force crew.

Planned Activities

Removal and detonation of the highly volatile chemicals is scheduled for Tuesday, July 17. Extensive planning with local and state stakeholders is underway. USEPA will be entering into a Unified Command on July 16 with Montana DEQ and the Madison County Office of Emergency Management to support this operation. The current OSC on Site will become part of Incident Command and a second OSC will be deployed to oversee the explosives team.

The Madison County Sheriff will ensure the evacuation of all residences and businesses within an area determined by the Air Force. Other nearby residents will also be notified (note the OSC has been in contact with nearby residents).

The Montana Department of transportation will be closing two highways and a local road during the times when the chemicals are being moved from the facility into the Air Force trailer for transport to the detonation Site. It is expected that these closures will go off and on all day.

The Madison County Fire Department and an EMT Team will be on Site during these operations to provide site security and emergency support. Flight for Life and a HazMat crew with the nearby Bozeman Fire Department will also be on call.

Public Relations

PIOs from USEPA, State, County and Air Force are coordinating. The county expects to release a statement on there public media profiles Monday announcing that hazmat activities will will be occurring and the public should expect road closures. A link to USEPA's website will also be provided. The OSC and EPA PIO are currently working to update this website. The County and State PIOs will be on-Site Tuesday and USEPA's PIO will be on call. No media events are planned.

Issues

There is a gas station nearby to the Site that will be evacuated.

NOTE: USEPA, Air Force, DOT, State and County officials are coordinating all site activities very closely.